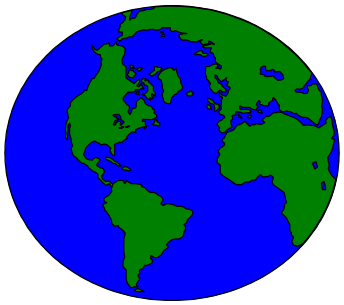
Environmental Performance Assessment System (EPAS) Exit Briefing



External Assessment
Fort Gordon, GA

24 Jan-04 Feb 2005

Richard Valdivia

EPAS Team Leader

U.S. Army Center for Health Promotion and Preventive Medicine (USACHPPM)

EPAS OBJECTIVES

- ASSESS ARMY OPERATIONS USING STANDARD PROTOCOL
- IDENTIFY COMPLIANCE DEFICIENCIES
- RECOMMEND CORRECTIVE ACTIONS TO IMPROVE OVERALL PERFORMANCE
- TRACK COMPLIANCE TRENDS/PROGRESS
- INCREASE ENVIRONMENTAL AWARENESS

SITES EVALUATED

DPWL Facilities (Y)
93rd Signal BDE
63rd Signal BN (Y)
67th Signal BN (Y)
359th Signal BDE (USAR) (Y)
513th MI BDE (Y)
297th MI BN (Y)
EAMC (Y)
TASC (Y)

Green Lakes Golf Course (Y)
AAFES Facilities (Y)
90-day HW Storage Facility (Y)
HMCC (Y)
Power Plants (Y)
W & WW Treatment Plants (Y)
Dental Clinics
SAPs (Y)

DOD EPAS TEAM GUIDE

Media Areas

- Air Emissions
- Asbestos
- Cultural Resources
- Hazardous Materials*
- PCBs
- Hazardous Waste
- Natural Resources
- Program Management
- Installation Restoration Management
- Pollution Prevention
- Lead-based Paint
- Environmental Impacts
- Pesticide Management
- Petroleum, Oils, and Lubricants
- Radon*
- Solid Waste (includes Medical)
- Storage Tanks
- Environmental Noise
- Wastewater
- Water Quality

* Were not assessed during this EPAS

Finding Categories

- **Class I** – Noncompliance with Federal or State regulation
- **Class II** – Future noncompliance with Federal or State regulation
- **Class III** – Noncompliance with Army or DoD regulation; or contrary to good management practice
- **Positive** – Exemplary, or over and above the regulatory requirements

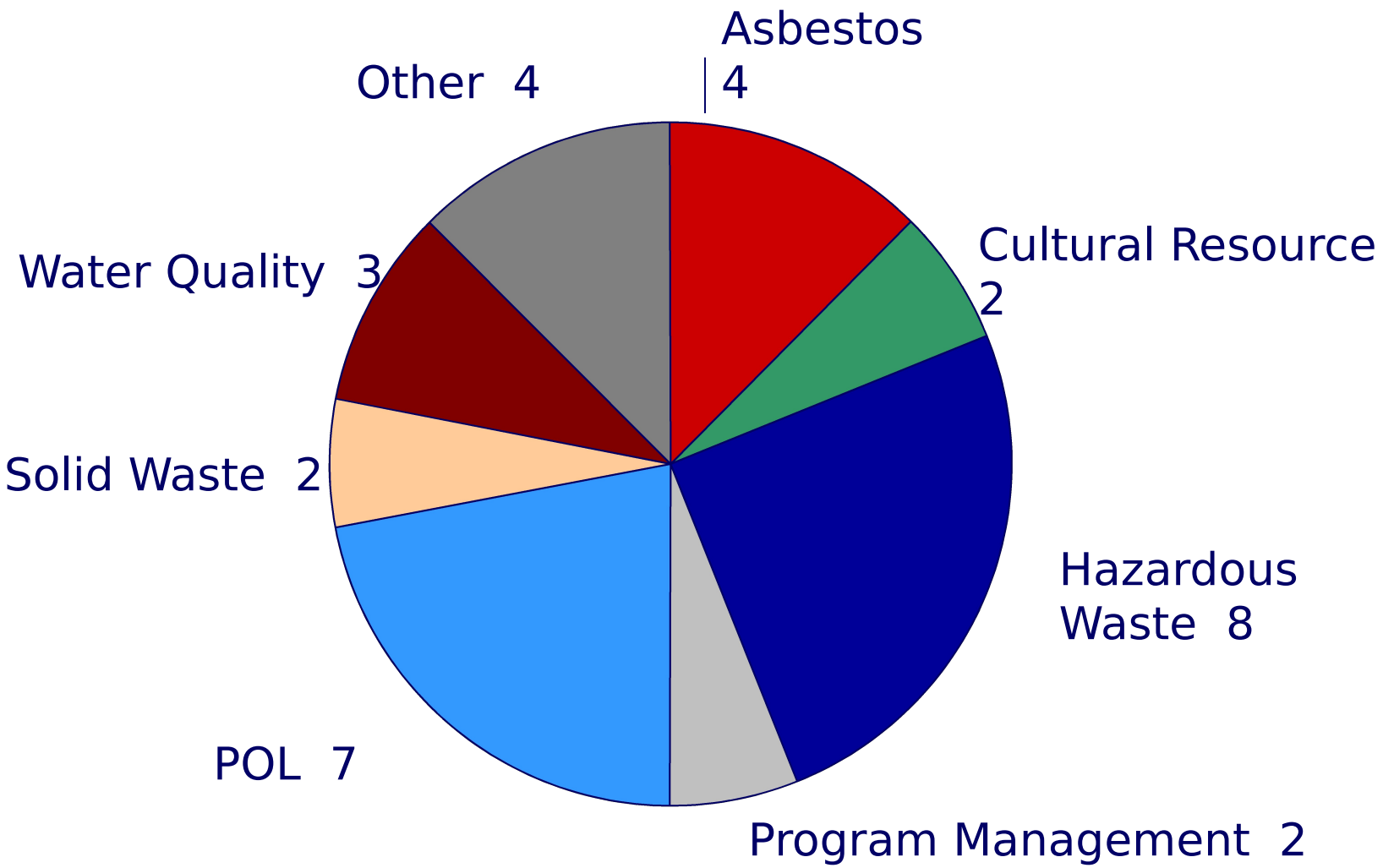
Fort Gordon Assessment Summary

- 16 Media Assessors
- Over 150 Site Visits/Interviews
- 32 Negative Findings Developed
  - 16 Class 1 findings
  - 7 Class 2 findings
  - 9 Class 3 findings

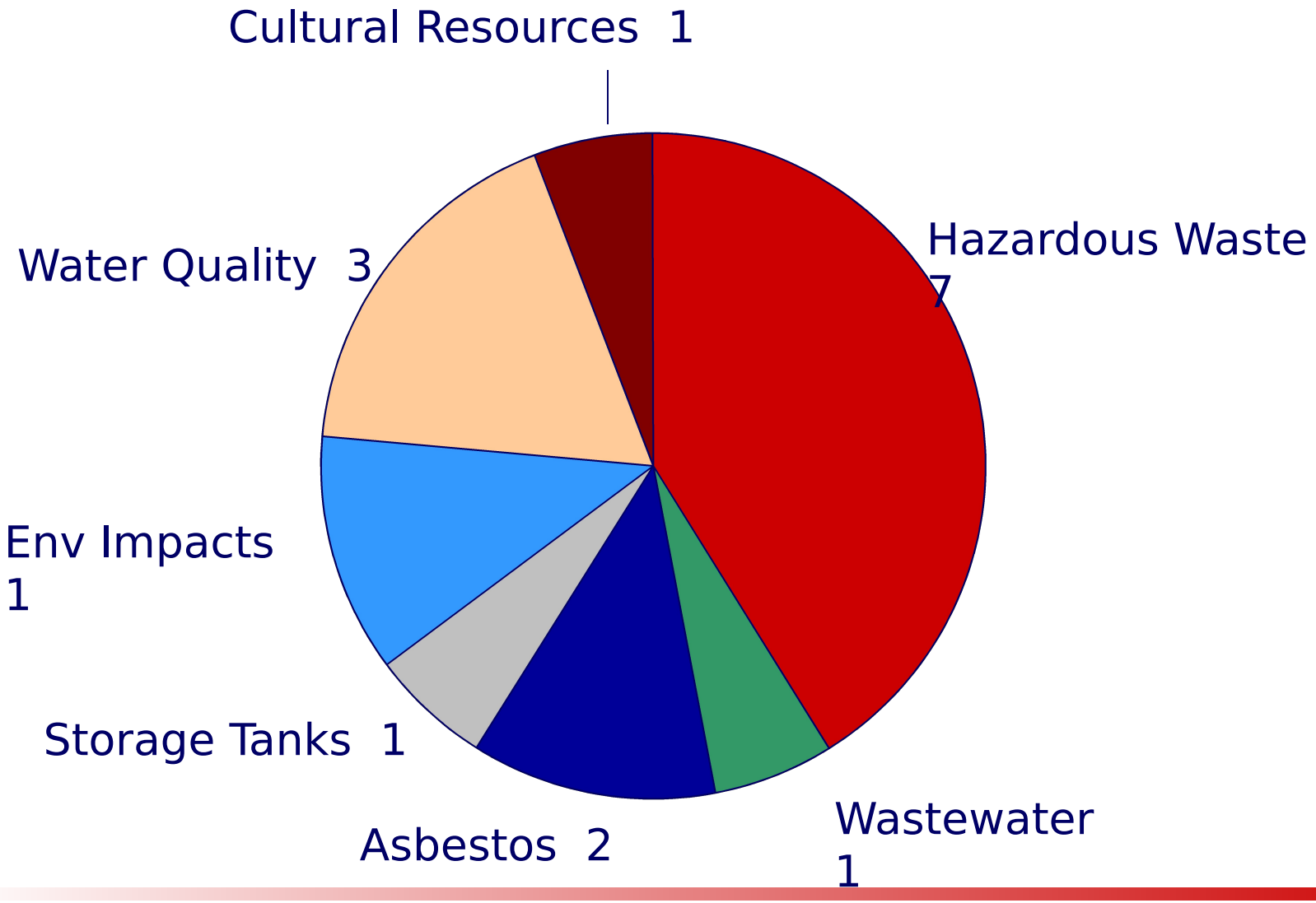
Program Areas With No Findings

Air Emissions
Environmental Noise
Installation Restoration Program
Lead-Based Paint
Natural Resource Management
Pesticide Management
Polychlorinated Biphenyls (PCBs)
Pollution Prevention

Negative Findings By Program Area



Negative Class 1 Findings By Program Area



Significant Findings

SPCC - Oil Pollution Prevention regulation, 40 CFR 112

- Provide secondary containment for FOG containers and mobile oil storage containers
- Perform integrity testing of ASTs
- Lack of overfill protection for ASTs
- Conduct interstitial monitoring for leaks at double-walled ASTs

Significant Findings

- WWTP did not meet NPDES permit conditions:

  - crumbling trickling filter walls
  - inoperable ultraviolet disinfection
  - leachate treatment system bypassing the WWTP

Finding – Highest Potential For Enforcement Actions/Fines

- Standpipe was susceptible to contamination
- WTP may not meet the treatment technique requirements
- Hazardous waste program:

  - failure to characterize HW

  - disposal & management of universal waste

  - emergency coordinator list out-of-date

Repeats and Carryovers

- 0 Repeat Findings

- 10 Carryover Findings
  - Closure Reports for USTs (class 1)
  - The standpipe was susceptible to contamination (class 1)
  - WWTP did not meet NPDES permit conditions (class 1)
  - 3 POL findings: new requirements to 40 CFR 112, Oil Pollution Prevention Regulation (class 2)
  - 2 SW findings: Incomplete ISWMP & No composting program (class 3)
  - Not implementing the ICRMP (class 3)

Special Recognition
Fort Gordon

- Overall Environmental Program

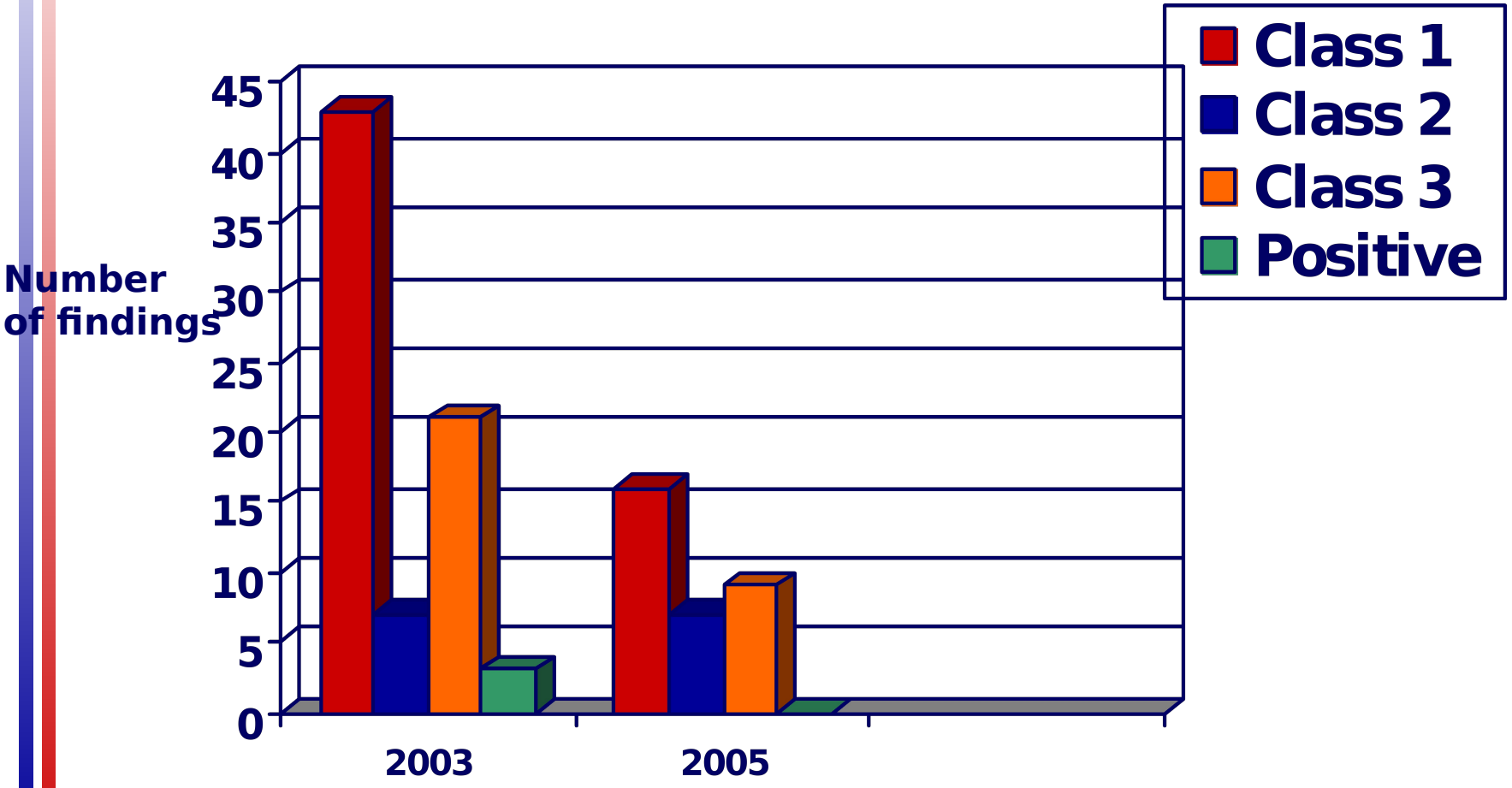
  - Natural Resources – developed a useful GIS to achieve training, and resource management needs

  - Air Emissions – Title V permits were met and reported as required

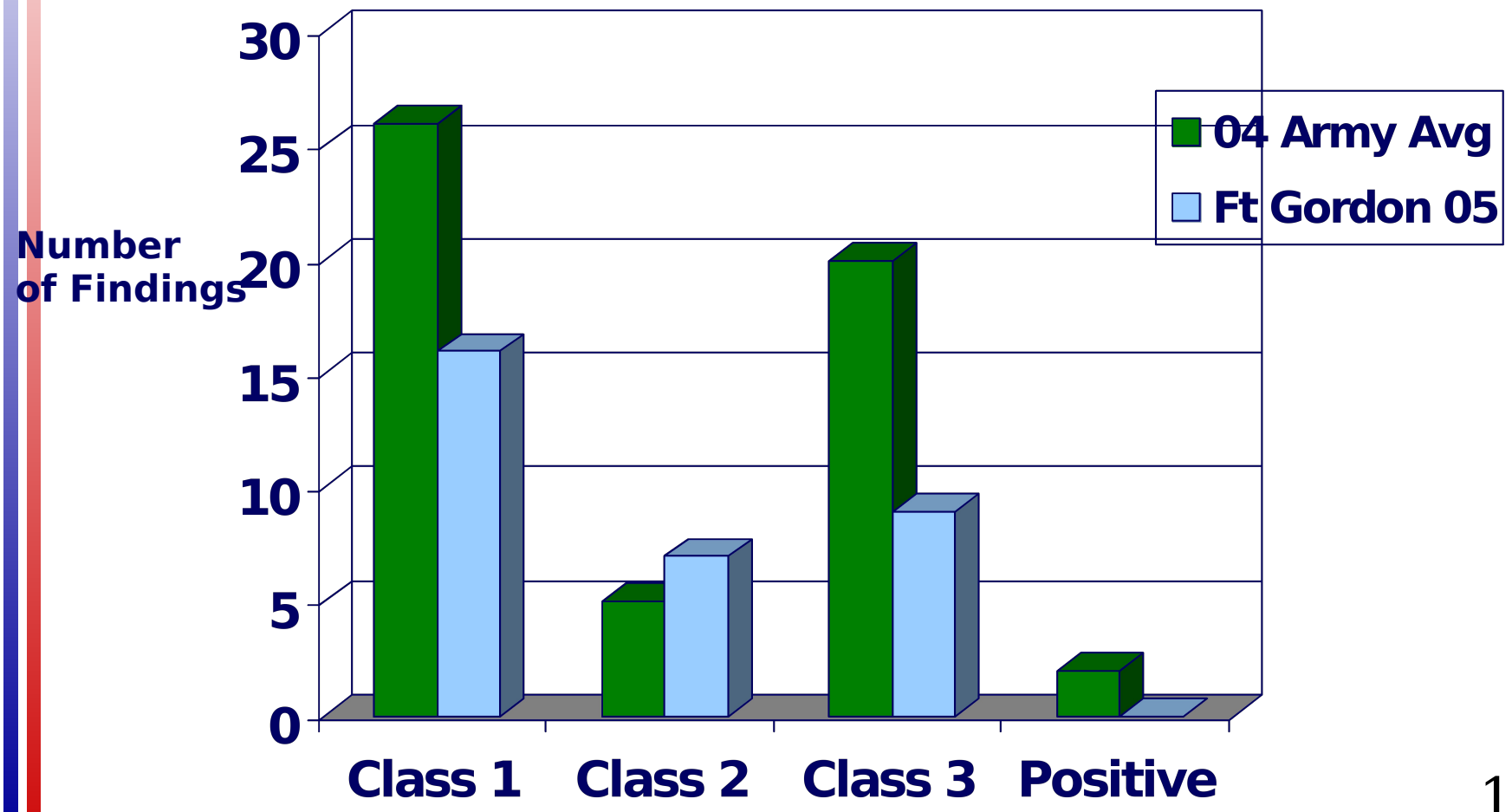
  - Pesticide Management – Installation net the new Department of Defense Measures of Merit for pesticide usage

  - NEPA – a valuable resource - supporting the long-term sustainability of the on-going Installation's military mission

Fort Gordon EPAS Findings Trend

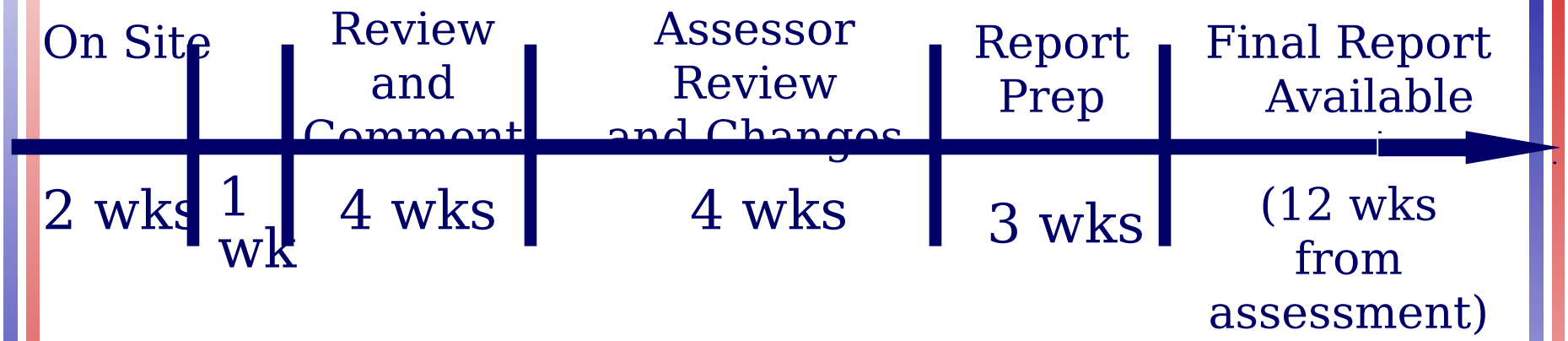


Comparison to Average Number of Findings for '04 CONUS Assessments



EPAS TIMELINE

Fort Gordon External Assessment

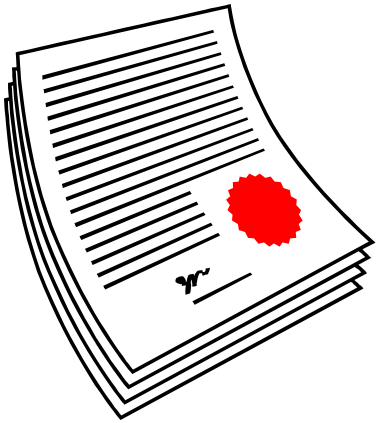


- **SITE VISITS: 24 Jan-04 Feb 05**
- **EXIT BRIEF/DRAFT REPORT: 03 Feb 05**
- **REVIEW PERIOD: 12 Feb–14 Mar 05**
- **FINAL REPORT AVAILABLE (EPAR): 11 Apr 05**

Installation Corrective Action Plan (ICAP)

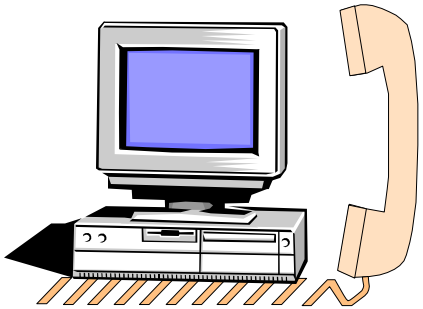
- Developed by installation with SERO guidance
- Includes funding strategy for all findings & ownership
- SERO supports timelines & funding strategy
- EQCC Review / Annual Certification

Executive Summary



- **ODEP requires Executive Summary Reports to be prepared for assessments conducted at CONUS Active Component installations**
- **Purpose is to provide greater EPAS program visibility at IMA and HQDA levels and bring significant compliance issues to attention**
- **Report must be submitted through Command channels to ODEP within 30 days of the assessment**

For additional information...



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